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State of Utah

DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH

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Ref G

March 16, 1989

Mr. Ed King
Jumbo Mining Co.
6305 Fern Spring Cove
Austin, Texas 78730

Re: Jumbo Mine (formally Drum Mine)
Request for Permission to use leach pads

Dear Mr. King:

We have reviewed your proposal dated February 2, 1989, requesting: (1) an extension to 1992 for use of the leach pads; (2) Removal of ore for crushing and restacking above 40 feet, (3) use of previously unauthorized pads and (4) neutralization criteria. We offer the following comments and responses.

1. We reaffirm the Bureau's position as stated in our 14 December 1988 letter that heap leach pads which were authorized by construction permit may be leached until 1 October 1990. Jumbo Mining was advised verbally of the restricted nature of these properties during your first visit in July 1988 and in our letter dated 21 July 1988. An official statement concerning these properties and their limited potential is clearly outlined in our letter of 23 September 1988 of which Jumbo mining was aware before purchasing the property.
2. Our response to Jumbo Mining's request for a variance to the 40-foot leach pad height restriction is addressed in the Bureau's 14 December 1988 letter. Ore must not be stacked in excess of 40 feet height on these pads.
3. The Bureau response to Jumbo mining's request to resume operation of the unauthorized heap leach pads remains the same as stated in our 23 September 1988 order. These pads were not authorized and are not to be used.

These matters were discussed during a telephone conversation 1 March 1989 with Mack Croft.

The following additional information concerning the neutralization criteria must be provided for review:

- a. It must be stated whether the maximum cyanide concentration of 0.2 mg/l refers to total or free cyanide.
- b. The number and spacing of tests to verify heap leach pad neutralization must be specified.

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- c. The process pond flexible membranes must be tested according to EPA Hazardous waste criteria and be disposed of in an acceptable manner consistent with the results of those tests.

We are awaiting your response to the following items, which we requested in a previous letter:

1. We understand that details of the thickness of ore which will remain on each pad based on maximum ore size will be provided.
2. We understand that details of the depth restraint ripper tooth will be provided.
3. We understand that cyanide will only be applied to ore which is resting upon an approved lined heap leach pad.

Please contact Charlie Dietz or Mack Croft if you have any further questions.

Sincerely,



Don Ostler, P.E., Director
Bureau of Water Pollution Control

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